

EXHIBIT 2

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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 RICHARD KADREY, et al.,
16 Individual and Representative Plaintiffs,
17 v.
18 META PLATFORMS, INC., a Delaware
19 corporation;
20 Defendant.

Case No. 3:23-cv-03417-VC

**DEFENDANT META PLATFORMS, INC.'S
OBJECTIONS AND RESPONSES TO
PLAINTIFFS' FIRST SET OF REQUESTS FOR
PRODUCTION**

Trial Date: None
Date Action Filed: July 7, 2023

PROPOUNDING PARTY: PLAINTIFFS RICHARD KADREY, SARAH SILVERMAN, CHRISTOPHER GOLDEN, MICHAEL CHABON, TA-NEHISI COATES, JUNOT DÍAZ, ANDREW SEAN GREER, DAVID HENRY HWANG, MATTHEW KLAM, LAURA LIPPMAN, RACHEL LOUISE SNYDER, AYELET WALDMAN, AND JACQUELINE WOODSON

RESPONDING PARTY: DEFENDANT META PLATFORMS, INC.

SET NUMBER: ONE ONE

Pursuant to Federal Rules of Civil Procedure Rules 26 and 34, and Local Rule 34, Defendant Meta Platforms, Inc. (“Meta”) responds as follows to Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Michael Chabon, Ta-Nehisi Coates, Junot Díaz, Andrew Sean Greer, David Henry Hwang, Matthew Klam, Laura Lippman, Rachel Louise Snyder, Ayelet Waldman, and Jacqueline Woodson’s (“Plaintiffs”) First Set of Requests for Production (“Requests”).

I. RESPONSES TO ALL REQUESTS

1. Meta’s responses to the Requests are made to the best of Meta’s present knowledge, information, and belief. Said responses are at all times subject to such additional or different information that discovery or further investigation may disclose, and Meta reserves the right to amend, revise, correct, supplement, or clarify the responses and objections propounded herein.

2. Meta reserves the right to make any use of, or to introduce at any hearing and at trial, documents responsive to the Requests but discovered subsequent to the date of Meta’s initial production, including, but not limited to, any documents obtained in discovery herein.

3. To the extent that Meta agrees to produce documents in response to any Requests, Meta will respond with responsive, non-privileged information currently in its possession, custody, or control. Meta has no duty to produce or identify information outside of its possession, custody or control. By stating in these responses that Meta will produce documents or is searching for documents, Meta does not represent that any document actually exists, but rather that it will make a good faith search and reasonable inquiry to ascertain whether documents responsive to these Requests do, in fact, exist and to produce such documents if they are found to exist and are within Meta’s possession, custody, or control.

1 4. To the extent that Meta responds to a Request by stating that Meta will provide
2 documents that Meta deems to embody material that is private, business confidential, proprietary,
3 trade secret, or otherwise protected from disclosure pursuant to Federal Rule of Civil Procedure
4 26(c) and/or Federal Rule of Evidence 501, Meta will only do so subject to the parties' stipulated
5 protective order governing the unauthorized use or disclosure of such information or documents
6 with a designated "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES
7 ONLY" or "HIGHLY CONFIDENTIAL – SOURCE CODE" distinction (ECF No. 90, the
8 "Protective Order").

9 5. The provision of a response to any of these Requests does not constitute a waiver of
10 any objection regarding the use of said response in these proceedings. Meta reserves all objections
11 or other questions as to the competency, relevance, materiality, privilege or admissibility as
12 evidence in any subsequent proceeding in or trial of this or any other action for any purpose
13 whatsoever of this response and any document or thing produced in response to the Requests.

14 6. Meta reserves the right to object on any ground and at any time to such other or
15 supplemental requests for production that Plaintiffs may propound involving or relating to the
16 subject matter of these Requests.

17 7. Unless otherwise stipulated in a production protocol or ordered by the Court, Meta
18 will produce each document in response to these Requests in a form in which it is ordinarily
19 maintained or in a reasonably usable form.

20 **II. OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS**

21 Whether or not separately set forth in response to each Request, Meta makes these
22 objections to the following Instructions and Definitions.

23 1. Meta objects to the definition of "Agreement" as overbroad and unduly burdensome
24 to the extent that it encompasses oral contracts, arrangements, or understandings, including those
25 that are informal. Meta further objects to the definition of "Agreement" as vague, ambiguous, and
26 unintelligible as to the term "modifications" to the extent it is intended to mean something distinct
27 from "versions" or "amendments." Meta will construe "Agreement" to mean written contracts,
28 including drafts, versions, amendments, exhibits, and appendices thereof.

1 2. Meta objects to the definition of “Communications” to the extent it encompasses
2 email and other forms of electronic correspondence (collectively “email”). The parties are currently
3 negotiating a protocol for managing electronic discovery (“ESI Order”), including email. The
4 parties continue to meet and confer regarding that language. Regardless, under Meta’s
5 understanding of both parties’ current proposals, email production shall be limited to a specified
6 number of custodians and search terms to be identified by the requesting party, and such “search
7 terms shall be narrowly tailored to particular issues.” In view of this, Meta objects to production
8 of email or information therefrom in response to these Requests at this time. Pending the entry of
9 an ESI Order, and pending service of identification of custodians and search terms that comply with
10 any such additional agreed upon or Court-ordered requirements for email production in an entered
11 ESI Order, Meta does not intend to search for or produce email. At such time, Meta will respond
12 to any identification of custodians and search terms that comply with the requirements of the
13 entered ESI Order in the manner set forth by the ESI Order. To the extent that Meta responds to a
14 Request for “Communications” by agreeing to search for relevant, non-privileged communications
15 in Meta’s possession, custody, or control, such response is not a representation that any particular
16 custodian or search term is appropriate. Meta expressly reserves the right to object to any
17 custodians and search terms proposed by Plaintiffs.

18 3. Meta objects to the definition of “Identify” as there are Requests for Production and
19 not Interrogatories. Purporting to require Meta to “Identify” certain information in response to a
20 Request for Production would otherwise circumvent the interrogatory limit. Meta further objects
21 to this definition to the extent it exceeds the scope of Federal Rule 34 by imposing an obligation
22 that Meta create new documents in response to these Requests.

23 4. Meta objects to the definitions of “Llama 1,” “Llama 2,” and “Llama 3” as vague
24 and ambiguous as to the undefined terms “precursor models” and “variant models.” Meta further
25 objects to these definitions as overbroad, unduly burdensome, and disproportionate to the needs of
26 the case to the extent that it purports to require Meta to produce documents or information
27 concerning large language models (“LLMs”) that were not publicly released and/or were not trained
28 on corpuses of text that include any of Plaintiffs’ allegedly copyrighted works. For the same reason,

1 Meta objects to these definitions to the extent that they purport to require Meta to produce
2 documents or information concerning LLMs that are not relevant to any party's claims or defenses.
3 For purposes of these responses, Meta construes the term "Llama 1" to refer to the LLM released
4 by Meta as Llama on February 24, 2023, and the term "Llama 2" to refer to the LLM released by
5 Meta under that name on July 18, 2023. Meta objects to the term "Llama 3," and to all Instructions
6 and Requests that include it, on the ground that Llama 3 is not yet completed and not the subject of
7 any claim in this litigation.

8 **5.** Meta objects to the definition of "Meta" as overbroad, unduly burdensome, and
9 disproportionate to the needs of the case to the extent that it purports to require Meta to produce
10 documents or information concerning any "owners" regardless of shareholder interest and
11 shareholders with an ownership of in Meta of greater than 5%. Meta will construe "Meta" or "You"
12 to mean Meta Platforms, Inc.

13 **6.** Meta objects to the definition of "Meta Language Models" as vague and ambiguous
14 as to the undefined terms "precursor models" and "variant models." Meta further objects to this
15 definition as overbroad, unduly burdensome, and disproportionate to the needs of the case to the
16 extent that it purports to require Meta to produce documents concerning LLMs that were not
17 publicly released and/or were not trained on corpuses of text that allegedly include any of Plaintiffs'
18 allegedly copyrighted works. For the same reason, Meta objects to this definition to the extent that
19 it purports to require Meta to produce documents that are not relevant to any party's claims or
20 defenses. Meta will construe "Meta Language Models" to mean the models within the Llama
21 family of LLMs that have been publicly released by Meta, namely, Llama 1, Llama 2, and Code
22 Llama.

23 **7.** Meta objects to the definition of "Relevant Period" as vague, ambiguous, and
24 unintelligible, as it is defined circularly to mean "all times relevant to . . . the Complaint." Meta
25 will construe the Relevant Period to mean January 1, 2022 to the present.

26 **8.** Meta objects to the definition of "Training Data" as vague, ambiguous, and
27 unintelligible as to the term "other material," which is indefinite and undefined. Meta further
28 objects to the definition of "Training Data" as vague and ambiguous as to the phrase "considered

1 for use,” which, read literally, would encompass any dataset considered by any Meta employee,
2 regardless of the seriousness of such consideration and whether or not that consideration was ever
3 acted upon. Meta further objects to this definition to the extent it purports to include datasets (or
4 “considered” datasets) that include content to which Plaintiffs have made no claim of ownership
5 and which are not the subject of any allegations of copyright infringement by Plaintiffs. Meta will
6 construe “Training Data” to mean the “Books3” textual dataset used to train the Meta Language
7 Models (as construed above).

8 **9.** Meta objects to the definition of “You” and “Your” as overbroad, unduly
9 burdensome, and nonsensical, insofar as it refers to “the specific Defendant producing documents
10 in response to these Requests.” Meta further objects to this definition to the extent it seeks to
11 impose upon Meta an obligation to investigate information or documents outside of its possession,
12 custody, or control. For purposes of these responses, Meta construes the terms “You” and “Your”
13 coextensively with Meta (as construed above).

14 **10.** Meta objects to Instructions 2 and 3 to the extent that they purport to require more
15 of Meta than any obligation imposed by law, and would subject Meta to unreasonable and undue
16 burden and expense. Meta will produce responsive documents in a reasonably usable form and/or
17 in accordance with an ESI Order.

18 **11.** Meta objects to Instruction 4 to the extent that it purports to require more of Meta
19 than any obligation imposed by law, would subject Meta to unreasonable, disproportionate and
20 undue burden and expense, and would seek to impose upon Meta an obligation to investigate or
21 discover information or materials in the possession, custody, or control of third parties.

22 **12.** Meta objects to Instruction 5 as overbroad and unduly burdensome to the extent that
23 it purports to require more of Meta than any obligation imposed by law and would subject Meta to
24 unreasonable, disproportionate, and undue burden and expense. Meta also objects to this
25 instruction to the extent that it purports to require Meta to investigate and opine on documents that
26 are not within Meta’s possession, custody, or control. Meta further objects to this instruction as
27 improperly demanding a narrative response, which is the proper subject of an interrogatory, and
28 thereby seeking to circumvent the interrogatory limit.

1 **13.** Meta objects to Instruction 6 as vague, ambiguous, and unintelligible as to the phrase
 2 “item or category of item.” Meta further objects to this instruction to the extent that it purports to
 3 require Meta to state objections as to specific documents.

4 **14.** Meta objects to Instruction 7 as overbroad and unduly burdensome to the extent that
 5 it purports to require more of Meta than any obligation imposed by law and would subject Meta to
 6 unreasonable, disproportionate, and undue burden and expense. Meta will provide Plaintiffs with
 7 a privilege log in accordance with Rule 26.

8 **15.** Meta objects to Instruction 8 to the extent that it purports to require Meta to produce
 9 documents protected by attorney-client privilege and/or attorney work product doctrine.

10 **III. OBJECTIONS AND RESPONSES TO INDIVIDUAL DOCUMENT REQUESTS**

11 **REQUEST FOR PRODUCTION NO. 1:**

12 The Training Data for Llama 1.

13 **RESPONSE TO REQUEST NO. 1:**

14 Meta incorporates by reference its objections and definitions above, including to the terms
 15 “Training Data” and “Llama 1.”

16 Subject to and without waiving the foregoing objections, and pursuant to the terms the
 17 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce, or, if
 18 technically infeasible or impractical to produce, identify public sources of or permit inspection of
 19 a copy of the training data set(s) used to train Llama 1. Any such production shall be on a rolling
 20 basis, and the timing of any such production shall be governed by terms of the Scheduling Order
 21 (ECF No. 87).

22 **REQUEST FOR PRODUCTION NO. 2:**

23 The Training Data for Llama 2.

24 **RESPONSE TO REQUEST NO. 2:**

25 Meta incorporates by reference its objections and definitions above, including to the terms
 26 “Training Data” and “Llama 2.”

27 Subject to and without waiving the foregoing objections, and pursuant to the terms the
 28 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce, or, if

1 technically infeasible or impractical to produce, identify public sources of or permit inspection of
2 a copy of the training data set(s) used to train Llama 2. Any such production shall be on a rolling
3 basis, and the timing of any such production shall be governed by terms of the Scheduling Order
4 (ECF No. 87).

5 **REQUEST FOR PRODUCTION NO. 3:**

6 The Training Data for Llama 3.

7 **RESPONSE TO REQUEST NO. 3:**

8 Meta incorporates by reference its objections and definitions above, including to the terms
9 “Training Data” and “Llama 3.”

10 Meta objects to this Request as vague and ambiguous as to “Llama 3” because Llama 3 has
11 not yet been completed. To the extent that the released version of Llama 3 will have been trained
12 on datasets other than those responsive to Request Nos. 2 and 3, this Request is premature.

13 **REQUEST FOR PRODUCTION NO. 4:**

14 The Training Data comprising the “Books3” dataset referenced in the paper “LLaMA: Open
15 and Efficient Foundation Language Models,” and all Documents and Communications Concerning
16 Your selection and assembly of this dataset.

17 **RESPONSE TO REQUEST NO. 4:**

18 Meta incorporates by reference its objections and definitions above, including to the terms
19 “Training Data,” “Communications,” and “Your.” Any electronic communications, including
20 email and documents attached thereto, must be requested pursuant to the ESI Order.

21 Meta objects to this Request because, on its face, it does not exclude documents and
22 communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or
23 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
24 documents will not be produced.

25 Meta objects to this Request to the extent that it implies that Meta “assembl[ed]” the Books3
26 dataset.

27 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
28 needs of the case to the extent that it seeks “all” documents and communications concerning the

1 subject matter of the Request, including documents with limited, if any, relevance to Plaintiffs’
2 copyright infringement allegations and Meta’s defenses thereto.

3 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
4 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce, or, if
5 technically infeasible or impractical to produce, identify public sources of or permit inspection of
6 a copy of the “Books3” dataset referenced in the paper “LLaMA: Open and Efficient Foundation
7 Language Models.” Meta will also conduct a reasonable search for and produce non-privileged,
8 relevant documents, if any, in its possession, custody, or control sufficient to show the selection of
9 said dataset for use in training any Meta Language Models (as construed above). Following the
10 identification of appropriate search terms and custodians by Plaintiffs pursuant to the ESI Order to
11 be used to search for email and electronic communications, and subject to the foregoing objections
12 as well as Meta’s objections to said custodians and search terms, Meta will also search for and
13 produce non-privileged, relevant communications responsive to this Request, if any, in accordance
14 with the limitations set forth in the ESI Order. Any such production shall be on a rolling basis, and
15 the timing of any such production shall be governed by terms of the Scheduling Order (ECF No.
16 87).

17 **REQUEST FOR PRODUCTION NO. 5:**

18 The Training Data comprising the “Gutenberg” dataset referenced in the paper “LLaMA:
19 Open and Efficient Foundation Language Models”, and all Documents and Communications
20 Concerning Your selection and assembly of this dataset.

21 **RESPONSE TO REQUEST NO. 5:**

22 Meta incorporates by reference its objections and definitions above, including to the terms
23 “Training Data,” “Communications,” and “Your.” Any electronic communications, including
24 email and documents attached thereto, must be requested pursuant to the ESI Order.

25 Meta objects to this Request because, on its face, it does not exclude documents and
26 communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or
27 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
28 documents will not be produced.

Meta objects to this Request to the extent that it implies that Meta is responsible for having “assembl[ed]” the Gutenberg dataset.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent that it seeks “all” documents and communications concerning the subject matter of the Request, including documents with limited, if any, relevance to Plaintiffs’ copyright infringement allegations and Meta’s defenses thereto.

Subject to and without waiving the foregoing objections, and pursuant to the terms of the Protective Order and ESI Order, Meta will conduct a reasonable search for and produce, or, if technically infeasible or impractical to produce, identify public sources of or permit inspection of a copy of the “Gutenberg” dataset referenced in the paper “LLaMA: Open and Efficient Foundation Language Models.” Meta will also conduct a reasonable search for and produce non-privileged, relevant documents, if any, in its possession, custody, or control concerning the selection of said dataset for use in training any Meta Language Models (as construed above). Following the identification of appropriate search terms and custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic communications, and subject to the foregoing objections as well as Meta’s objections to said custodians and search terms, Meta will also search for and produce non-privileged, relevant communications responsive to this Request, if any, in accordance with the limitations set forth in the ESI Order. Any such production shall be on a rolling basis, and the timing of any such production shall be governed by terms of the Scheduling Order (ECF No. 87).

REQUEST FOR PRODUCTION NO. 6:

Documents and Communications to, from, or with Project Gutenberg Concerning Training Data.

RESPONSE TO REQUEST NO. 6:

Meta incorporates by reference its objections and definitions above, including to the terms “Training Data” and “Communications.” Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

1 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
2 Communications to, from, or with” to the extent it is seeking materials other than those governed
3 by the procedure for requesting email and electronic communications under the ESI Order, and
4 Meta interprets the Request as seeking such email and electronic communications and Documents
5 attached thereto. This Request is also vague and ambiguous as to the term “Project Gutenberg,”
6 which is undefined. In the context of this Request, Meta will construe this phrase to mean the
7 organization referenced here: <https://www.gutenberg.org/>.

8 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
9 needs of the case to the extent that it is interpreted to seek all documents and communications
10 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
11 and disproportionate to the needs of the case to the extent it seeks documents and communications
12 in the possession, custody, or control of, and/or concerns a third-party.

13 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
14 Protective Order and ESI Order, following the identification of appropriate search terms and
15 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
16 communications, and subject to the foregoing objections as well as Meta’s objections to said
17 custodians and search terms, Meta will search for and produce non-privileged, relevant
18 communications responsive to this Request, if any, in accordance with the limitations set forth in
19 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
20 production shall be governed by terms of the Scheduling Order (ECF No. 87).

21 **REQUEST FOR PRODUCTION NO. 7:**

22 Documents and Communications to, from, or with Library Genesis (aka LibGen)
23 Concerning Training Data.

24 **RESPONSE TO REQUEST NO. 7:**

25 Meta incorporates by reference its objections and definitions above, including to the terms
26 “Training Data” and “Communications.” Any electronic communications, including email and
27 documents attached thereto, must be requested pursuant to the ESI Order.

28

1 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
2 Communications to, from, or with” to the extent it is seeking materials other than those governed
3 by the procedure for requesting email and electronic communications under the ESI Order, and
4 Meta interprets the Request as seeking such email and electronic communications and Documents
5 attached thereto. This Request is also vague and ambiguous as to the term “Library Genesis,”
6 which is undefined. In the context of this Request, Meta will construe this phrase to mean the
7 organization referenced here: <http://libgen.li/>.

8 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
9 needs of the case to the extent that it is interpreted to seek all documents and communications
10 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
11 and disproportionate to the needs of the case to the extent it seeks documents and communications
12 in the possession, custody, or control of, and/or concerns a third-party.

13 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
14 Protective Order and ESI Order, following the identification of appropriate search terms and
15 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
16 communications, and subject to the foregoing objections as well as Meta’s objections to said
17 custodians and search terms, Meta will search for and produce non-privileged, relevant
18 communications responsive to this Request, if any, in accordance with the limitations set forth in
19 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
20 production shall be governed by terms of the Scheduling Order (ECF No. 87).

21 **REQUEST FOR PRODUCTION NO. 8:**

22 Documents and Communications to, from, or with Z-Library (aka B-ok) Concerning
23 Training Data.

24 **RESPONSE TO REQUEST NO. 8:**

25 Meta incorporates by reference its objections and definitions above, including to the terms
26 “Training Data” and “Communications.” Any electronic communications, including email and
27 documents attached thereto, must be requested pursuant to the ESI Order.

28

Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and Communications to, from, or with” to the extent it is seeking materials other than those governed by the procedure for requesting email and electronic communications under the ESI Order, and Meta interprets the Request as seeking such email and electronic communications and Documents attached thereto. This Request is also vague and ambiguous as to the term “Z-Library,” which is undefined. In the context of this Request, Meta will construe this phrase to mean the organization referenced here: <https://z-lib.io/>.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent that it is interpreted to seek all documents and communications concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent it seeks documents and communications in the possession, custody, or control of, and/or concerns a third-party.

Subject to and without waiving the foregoing objections, and pursuant to the terms of the Protective Order and ESI Order, following the identification of appropriate search terms and custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic communications, and subject to the foregoing objections as well as Meta’s objections to said custodians and search terms, Meta will search for and produce non-privileged, relevant communications responsive to this Request, if any, in accordance with the limitations set forth in the ESI Order. Any such production shall be on a rolling basis, and the timing of any such production shall be governed by terms of the Scheduling Order (ECF No. 87).

REQUEST FOR PRODUCTION NO. 9:

Documents and Communications to, from, or with Sci-Hub Concerning Training Data.

RESPONSE TO REQUEST NO. 9:

Meta incorporates by reference its objections and definitions above, including to the terms “Training Data” and “Communications.” Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and Communications to, from, or with” to the extent it is seeking materials other than those governed

1 by the procedure for requesting email and electronic communications under the ESI Order, and
2 Meta interprets the Request as seeking such email and electronic communications and Documents
3 attached thereto. This Request is also vague and ambiguous as to the term “Sci-Hub,” which is
4 undefined. In the context of this Request, Meta will construe this phrase to mean the organization
5 referenced here: <https://sci-hub.se/database>.

6 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
7 needs of the case to the extent that it is interpreted to seek all documents and communications
8 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
9 and disproportionate to the needs of the case to the extent it seeks documents and communications
10 in the possession, custody, or control of, and/or concerns a third-party.

11 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
12 Protective Order and ESI Order, following the identification of appropriate search terms and
13 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
14 communications, and subject to the foregoing objections as well as Meta’s objections to said
15 custodians and search terms, Meta will search for and produce non-privileged, relevant
16 communications responsive to this Request, if any, in accordance with the limitations set forth in
17 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
18 production shall be governed by terms of the Scheduling Order (ECF No. 87).

19 **REQUEST FOR PRODUCTION NO. 10:**

20 Documents and Communications to, from, or with Bibliotik Concerning Training Data.

21 **RESPONSE TO REQUEST NO. 10:**

22 Meta incorporates by reference its objections and definitions above, including to the terms
23 “Training Data” and “Communications.” Any electronic communications, including email and
24 documents attached thereto, must be requested pursuant to the ESI Order.

25 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
26 Communications to, from, or with” to the extent it is seeking materials other than those governed
27 by the procedure for requesting email and electronic communications under the ESI Order, and
28 Meta interprets the Request as seeking such email and electronic communications and Documents

1 attached thereto. This Request is also vague and ambiguous as to the term “Bibliotik,” which is
2 undefined. Furthermore, the Request is vague, ambiguous, and unintelligible as to “Documents
3 and Communications to, from, or with Bibliotik,” which Meta understands to be the name of a
4 dataset rather than an individual, group, business, or organization.

5 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
6 needs of the case to the extent that it is interpreted to seek all documents and communications
7 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
8 and disproportionate to the needs of the case to the extent it seeks documents and communications
9 in the possession, custody, or control of, and/or concerns what Plaintiffs appear to believe is third-
10 party.

11 **REQUEST FOR PRODUCTION NO. 11:**

12 Documents and Communications to, from, or with The Eye Concerning Training Data.

13 **RESPONSE TO REQUEST NO. 11:**

14 Meta incorporates by reference its objections and definitions above, including to the terms
15 “Training Data” and “Communications.” Any electronic communications, including email and
16 documents attached thereto, must be requested pursuant to the ESI Order.

17 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
18 Communications to, from, or with” to the extent it is seeking materials other than those governed
19 by the procedure for requesting email and electronic communications under the ESI Order, and
20 Meta interprets the Request as seeking such email and electronic communications and Documents
21 attached thereto. This Request is also vague and ambiguous as to the term “The Eye,” which is
22 undefined. In the context of this Request, Meta will construe this phrase to mean the organization
23 referenced here: <https://the-eye.eu/>.

24 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
25 needs of the case to the extent that it is interpreted to seek all documents and communications
26 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
27 and disproportionate to the needs of the case to the extent it seeks documents and communications
28 in the possession, custody, or control of, and/or concerns a third-party.

1 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
2 Protective Order and ESI Order, following the identification of appropriate search terms and
3 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
4 communications, and subject to the foregoing objections as well as Meta's objections to said
5 custodians and search terms, Meta will search for and produce non-privileged, relevant
6 communications responsive to this Request, if any, in accordance with the limitations set forth in
7 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
8 production shall be governed by terms of the Scheduling Order (ECF No. 87).

9 **REQUEST FOR PRODUCTION NO. 12:**

10 Documents and Communications to, from, or with Anna's Archive Concerning Training
11 Data.

12 **RESPONSE TO REQUEST NO. 12:**

13 Meta incorporates by reference its objections and definitions above, including to the terms
14 "Training Data" and "Communications." Any electronic communications, including email and
15 documents attached thereto, must be requested pursuant to the ESI Order.

16 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
17 Communications to, from, or with" to the extent it is seeking materials other than those governed
18 by the procedure for requesting email and electronic communications under the ESI Order, and
19 Meta interprets the Request as seeking such email and electronic communications and Documents
20 attached thereto. This Request is also vague and ambiguous as to the term "Anna's Archive," which
21 is undefined. In the context of this Request, Meta will construe this phrase to mean the organization
22 referenced here: <https://annas-archive.org/>.

23 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
24 needs of the case to the extent that it is interpreted to seek all documents and communications
25 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
26 and disproportionate to the needs of the case to the extent it seeks documents and communications
27 in the possession, custody, or control of, and/or concerns a third-party.
28

1 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
2 Protective Order and ESI Order, following the identification of appropriate search terms and
3 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
4 communications, and subject to the foregoing objections as well as Meta's objections to said
5 custodians and search terms, Meta will search for and produce non-privileged, relevant
6 communications responsive to this Request, if any, in accordance with the limitations set forth in
7 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
8 production shall be governed by terms of the Scheduling Order (ECF No. 87).

9 **REQUEST FOR PRODUCTION NO. 13:**

10 Documents and Communications to, from, or with Hugo Touvron Concerning Training
11 Data.

12 **RESPONSE TO REQUEST NO. 13:**

13 Meta incorporates by reference its objections and definitions above, including to the terms
14 "Training Data" and "Communications." Any electronic communications, including email and
15 documents attached thereto, must be requested pursuant to the ESI Order.

16 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
17 Communications to, from, or with" to the extent it is seeking materials other than those governed
18 by the procedure for requesting email and electronic communications under the ESI Order, and
19 Meta interprets the Request as seeking such email and electronic communications and Documents
20 attached thereto.

21 Meta objects to this Request because, on its face, it does not exclude documents and
22 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
23 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
24 documents will not be produced.

25 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
26 needs of the case to the extent that it is interpreted to seek all documents and communications
27 concerning the subject matter of the Request, including documents with limited, if any, relevance
28 to Plaintiffs' copyright infringement allegations and Meta's defenses thereto.

1 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
2 Protective Order and ESI Order, following the identification of appropriate search terms and
3 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
4 communications, and subject to the foregoing objections as well as Meta's objections to said
5 custodians and search terms, Meta will search for and produce non-privileged, relevant
6 communications responsive to this Request, if any, in accordance with the limitations set forth in
7 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
8 production shall be governed by terms of the Scheduling Order (ECF No. 87).

9 **REQUEST FOR PRODUCTION NO. 14:**

10 Documents and Communications to, from, or with Aurélien Rodriguez Concerning
11 Training Data.

12 **RESPONSE TO REQUEST NO. 14:**

13 Meta incorporates by reference its objections and definitions above, including to the terms
14 "Training Data" and "Communications." Any electronic communications, including email and
15 documents attached thereto, must be requested pursuant to the ESI Order.

16 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
17 Communications to, from, or with" to the extent it is seeking materials other than those governed
18 by the procedure for requesting email and electronic communications under the ESI Order, and
19 Meta interprets the Request as seeking such email and electronic communications and Documents
20 attached thereto.

21 Meta objects to this Request because, on its face, it does not exclude documents and
22 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
23 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
24 documents will not be produced.

25 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
26 needs of the case to the extent that it is interpreted to seek all documents and communications
27 concerning the subject matter of the Request, including documents with limited, if any, relevance
28 to Plaintiffs' copyright infringement allegations and Meta's defenses thereto.

1 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
2 Protective Order and ESI Order, following the identification of appropriate search terms and
3 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
4 communications, and subject to the foregoing objections as well as Meta's objections to said
5 custodians and search terms, Meta will search for and produce non-privileged, relevant
6 communications responsive to this Request, if any, in accordance with the limitations set forth in
7 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
8 production shall be governed by terms of the Scheduling Order (ECF No. 87).

9 **REQUEST FOR PRODUCTION NO. 15:**

10 Documents and Communications to, from, or with Tim Dettmers Concerning Training
11 Data.

12 **RESPONSE TO REQUEST NO. 15:**

13 Meta incorporates by reference its objections and definitions above, including to the terms
14 "Training Data" and "Communications." Any electronic communications, including email and
15 documents attached thereto, must be requested pursuant to the ESI Order.

16 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
17 Communications to, from, or with" to the extent it is seeking materials other than those governed
18 by the procedure for requesting email and electronic communications under the ESI Order, and
19 Meta interprets the Request as seeking such email and electronic communications and Documents
20 attached thereto.

21 Meta objects to this Request because, on its face, it does not exclude documents and
22 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
23 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
24 documents will not be produced.

25 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
26 needs of the case to the extent that it is interpreted to seek all documents and communications
27 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
28 and disproportionate to the needs of the case, in particular as it concerns a former Meta researcher

1 who was not a participant in the development or training of the Meta Language Models (as
2 construed above).

3 Meta objects to this Request to the extent it seeks information that is not relevant to any
4 party's claims or defenses, in particular information concerning language models other than the
5 Meta Language Models (as construed above).

6 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
7 Protective Order and ESI Order, following the identification of appropriate search terms and
8 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
9 communications, and subject to the foregoing objections as well as Meta's objections to said
10 custodians and search terms, Meta will search for and produce non-privileged, relevant
11 communications responsive to this Request, if any, in accordance with the limitations set forth in
12 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
13 production shall be governed by terms of the Scheduling Order (ECF No. 87).

14 **REQUEST FOR PRODUCTION NO. 16:**

15 Documents and Communications to, from, or with Luke Zettlemoyer Concerning Training
16 Data.

17 **RESPONSE TO REQUEST NO. 16:**

18 Meta incorporates by reference its objections and definitions above, including to the terms
19 "Training Data" and "Communications." Any electronic communications, including email and
20 documents attached thereto, must be requested pursuant to the ESI Order.

21 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
22 Communications to, from, or with" to the extent it is seeking materials other than those governed
23 by the procedure for requesting email and electronic communications under the ESI Order, and
24 Meta interprets the Request as seeking such email and electronic communications and Documents
25 attached thereto.

26 Meta objects to this Request because, on its face, it does not exclude documents and
27 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
28

1 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
2 documents will not be produced.

3 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
4 needs of the case to the extent that it is interpreted to seek all documents and communications
5 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
6 and disproportionate to the needs of the case, in particular as it concerns a Meta researcher who
7 was not a participant in the development or training of the Meta Language Models (as construed
8 above).

9 Meta objects to this Request to the extent it seeks information that is not relevant to any
10 party's claims or defenses, in particular information concerning language models other than the
11 Meta Language Models (as construed above).

12 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
13 Protective Order and ESI Order, following the identification of appropriate search terms and
14 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
15 communications, and subject to the foregoing objections as well as Meta's objections to said
16 custodians and search terms, Meta will search for and produce non-privileged, relevant
17 communications responsive to this Request, if any, in accordance with the limitations set forth in
18 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
19 production shall be governed by terms of the Scheduling Order (ECF No. 87).

20 **REQUEST FOR PRODUCTION NO. 17:**

21 Documents and Communications to, from, or with Shawn Presser Concerning Training
22 Data.

23 **RESPONSE TO REQUEST NO. 17:**

24 Meta incorporates by reference its objections and definitions above, including to the terms
25 "Training Data" and "Communications." Any electronic communications, including email and
26 documents attached thereto, must be requested pursuant to the ESI Order.

27 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
28 Communications to, from, or with" to the extent it is seeking materials other than those governed

1 by the procedure for requesting email and electronic communications under the ESI Order, and
2 Meta interprets the Request as seeking such email and electronic communications and Documents
3 attached thereto.

4 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
5 needs of the case to the extent that it is interpreted to seek all documents and communications
6 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
7 and disproportionate to the needs of the case to the extent it seeks documents and communications
8 in the possession, custody, or control of, and/or concerns a third-party.

9 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
10 Protective Order and ESI Order, following the identification of appropriate search terms and
11 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
12 communications, and subject to the foregoing objections as well as Meta's objections to said
13 custodians and search terms, Meta will search for and produce non-privileged, relevant
14 communications responsive to this Request, if any, in accordance with the limitations set forth in
15 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
16 production shall be governed by terms of the Scheduling Order (ECF No. 87).

17 **REQUEST FOR PRODUCTION NO. 18:**

18 Documents and Communications to, from, or with Stella Biderman Concerning Training
19 Data.

20 **RESPONSE TO REQUEST NO. 18:**

21 Meta incorporates by reference its objections and definitions above, including to the terms
22 "Training Data" and "Communications." Any electronic communications, including email and
23 documents attached thereto, must be requested pursuant to the ESI Order.

24 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
25 Communications to, from, or with" to the extent it is seeking materials other than those governed
26 by the procedure for requesting email and electronic communications under the ESI Order, and
27 Meta interprets the Request as seeking such email and electronic communications and Documents
28 attached thereto.

Meta objects to this Request to the extent it seeks production of documents protected by attorney-client privilege and/or attorney work product doctrines. As counsel for Meta has informed counsel for Plaintiffs, Meta learned through the allegations in the First Amended Consolidated Complaint that Tim Dettmers, a PhD student and part time AI researcher at Meta, inadvertently and without Meta's knowledge or authorization, shared Meta's privileged information on an EleutherAI Discord channel. Meta does not yet have access to those Discord communications, which it is now seeking to obtain. Meta does not intend to produce such communications.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent that it is interpreted to seek all documents and communications concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent it seeks documents and communications in the possession, custody, or control of, and/or concerns a third-party.

Subject to and without waiving the foregoing objections, and pursuant to the terms of the Protective Order and ESI Order, following the identification of appropriate search terms and custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic communications, and subject to the foregoing objections as well as Meta's objections to said custodians and search terms, Meta will search for and produce non-privileged, relevant communications responsive to this Request, if any, in accordance with the limitations set forth in the ESI Order. Any such production shall be on a rolling basis, and the timing of any such production shall be governed by terms of the Scheduling Order (ECF No. 87).

REQUEST FOR PRODUCTION NO. 19:

Documents and Communications to, from, or with Leo Gao Concerning Training Data.

RESPONSE TO REQUEST NO. 19:

Meta incorporates by reference its objections and definitions above, including to the terms "Training Data" and "Communications." Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and Communications to, from, or with" to the extent it is seeking materials other than those governed

1 by the procedure for requesting email and electronic communications under the ESI Order, and
2 Meta interprets the Request as seeking such email and electronic communications and Documents
3 attached thereto.

4 Meta objects to this Request to the extent it seeks production of documents protected by
5 attorney-client privilege and/or attorney work product doctrines. As counsel for Meta has informed
6 counsel for Plaintiffs, Meta learned through the allegations in the First Amended Consolidated
7 Complaint that Tim Dettmers, a PhD student and part time AI researcher at Meta, inadvertently and
8 without Meta's knowledge or authorization, shared Meta's privileged information on an EleutherAI
9 Discord channel. Meta does not yet have access to those Discord communications, which it is now
10 seeking to obtain. Meta does not intend to produce such communications.

11 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
12 needs of the case to the extent that it is interpreted to seek all documents and communications
13 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
14 and disproportionate to the needs of the case to the extent it seeks documents and communications
15 in the possession, custody, or control of, and/or concerns a third-party.

16 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
17 Protective Order and ESI Order, following the identification of appropriate search terms and
18 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
19 communications, and subject to the foregoing objections as well as Meta's objections to said
20 custodians and search terms, Meta will search for and produce non-privileged, relevant
21 communications responsive to this Request, if any, in accordance with the limitations set forth in
22 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
23 production shall be governed by terms of the Scheduling Order (ECF No. 87).

24 **REQUEST FOR PRODUCTION NO. 20:**

25 Documents and Communications to, from, or with EleutherAI Concerning Training Data.

26 **RESPONSE TO REQUEST NO. 20:**

27 Meta incorporates by reference its objections and definitions above, including to the terms
28 "Training Data" and "Communications." Any electronic communications, including email and

1 documents attached thereto, must be requested pursuant to the ESI Order.

2 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
3 Communications to, from, or with” to the extent it is seeking materials other than those governed
4 by the procedure for requesting email and electronic communications under the ESI Order, and
5 Meta interprets the Request as seeking such email and electronic communications and Documents
6 attached thereto. This Request is also vague and ambiguous as to “EleutherAI,” which is undefined.
7 In the context of this Request, Meta will construe this term to mean the organization referenced
8 here: <https://www.eleuther.ai/>.

9 Meta objects to this Request to the extent it seeks production of documents protected by
10 attorney-client privilege and/or attorney work product doctrines. As counsel for Meta has informed
11 counsel for Plaintiffs, Meta learned through the allegations in the First Amended Consolidated
12 Complaint that Tim Dettmers, a PhD student and part time AI researcher at Meta, inadvertently and
13 without Meta’s knowledge or authorization, shared Meta’s privileged information on an EleutherAI
14 Discord channel. Meta does not yet have access to those Discord communications, which it is now
15 seeking to obtain. Meta does not intend to produce such communications.

16 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
17 needs of the case to the extent that it is interpreted to seek all documents and communications
18 concerning the subject matter of the Request. This Request is also overbroad, unduly burdensome,
19 and disproportionate to the needs of the case to the extent it seeks documents and communications
20 in the possession, custody, or control of, and/or concerns a third-party.

21 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
22 Protective Order and ESI Order, following the identification of appropriate search terms and
23 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
24 communications, and subject to the foregoing objections as well as Meta’s objections to said
25 custodians and search terms, Meta will search for and produce non-privileged, relevant
26 communications responsive to this Request, if any, in accordance with the limitations set forth in
27 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
28 production shall be governed by terms of the Scheduling Order (ECF No. 87).

REQUEST FOR PRODUCTION NO. 21:

Documents and Communications to, from, or with Yann LeCun Concerning Training Data.

RESPONSE TO REQUEST NO. 21:

Meta incorporates by reference its objections and definitions above, including to the terms “Training Data” and “Communications.” Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and Communications to, from, or with” to the extent it is seeking materials other than those governed by the procedure for requesting email and electronic communications under the ESI Order, and Meta interprets the Request as seeking such email and electronic communications and Documents attached thereto.

Meta objects to this Request because, on its face, it does not exclude documents and communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such documents will not be produced.

Meta objects to this Request to the extent it seeks information that is not relevant to any party’s claims or defenses.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent that it is interpreted to seek all documents and communications concerning the subject matter of the Request, and because the identified Person is an executive and no showing has been made that the information sought is unavailable from others with direct involvement with Training Data.

REQUEST FOR PRODUCTION NO. 22:

Documents and Communications to, from, or with John Carmack Concerning Training Data.

RESPONSE TO REQUEST NO. 22:

Meta incorporates by reference its objections and definitions above, including to the terms “Training Data” and “Communications.” Any electronic communications, including email and

1 documents attached thereto, must be requested pursuant to the ESI Order.

2 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
3 Communications to, from, or with” to the extent it is seeking materials other than those governed
4 by the procedure for requesting email and electronic communications under the ESI Order, and
5 Meta interprets the Request as seeking such email and electronic communications and Documents
6 attached thereto.

7 Meta objects to this Request because, on its face, it does not exclude documents and
8 communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or
9 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
10 documents will not be produced.

11 Meta objects to this Request to the extent it seeks information that is not relevant to any
12 party’s claims or defenses.

13 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
14 needs of the case to the extent that it is interpreted to seek all documents and communications
15 concerning the subject matter of the Request, and because the identified Person is a former
16 executive and no showing has been made that the information sought is unavailable from others
17 with direct involvement with Training Data. Meta further objects to this Requests to the extent it
18 seeks documents and communications in the possession, custody, or control of a third-party.

19 **REQUEST FOR PRODUCTION NO. 23:**

20 Documents and Communications to, from, or with Andrew Bosworth Concerning Training
21 Data.

22 **RESPONSE TO REQUEST NO. 23:**

23 Meta incorporates by reference its objections and definitions above, including to the terms
24 “Training Data” and “Communications.” Any electronic communications, including email and
25 documents attached thereto, must be requested pursuant to the ESI Order.

26 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
27 Communications to, from, or with” to the extent it is seeking materials other than those governed
28 by the procedure for requesting email and electronic communications under the ESI Order, and

1 Meta interprets the Request as seeking such email and electronic communications and Documents
2 attached thereto.

3 Meta objects to this Request because, on its face, it does not exclude documents and
4 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
5 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
6 documents will not be produced.

7 Meta objects to this Request to the extent it seeks information that is not relevant to any
8 party's claims or defenses.

9 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
10 needs of the case to the extent that it is interpreted to seek all documents and communications
11 concerning the subject matter of the Request, and because the identified Person is an executive and
12 no showing has been made that the information sought is unavailable from others with direct
13 involvement with Training Data.

14 **REQUEST FOR PRODUCTION NO. 24:**

15 Documents and Communications to, from, or with Chris Cox Concerning Training Data.

16 **RESPONSE TO REQUEST NO. 24:**

17 Meta incorporates by reference its objections and definitions above, including to the terms
18 "Training Data" and "Communications." Any electronic communications, including email and
19 documents attached thereto, must be requested pursuant to the ESI Order.

20 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
21 Communications to, from, or with" to the extent it is seeking materials other than those governed
22 by the procedure for requesting email and electronic communications under the ESI Order, and
23 Meta interprets the Request as seeking such email and electronic communications and Documents
24 attached thereto.

25 Meta objects to this Request because, on its face, it does not exclude documents and
26 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
27 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
28 documents will not be produced.

1 Meta objects to this Request to the extent it seeks information that is not relevant to any
2 party's claims or defenses.

3 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
4 needs of the case to the extent that it is interpreted to seek all documents and communications
5 concerning the subject matter of the Request, and because the identified Person is an executive and
6 no showing has been made that the information sought is unavailable from others with direct
7 involvement with Training Data.

8 **REQUEST FOR PRODUCTION NO. 25:**

9 Documents and Communications to, from, or with Jennifer Newstead Concerning Training
10 Data.

11 **RESPONSE TO REQUEST NO. 25:**

12 Meta incorporates by reference its objections and definitions above, including to the terms
13 "Training Data" and "Communications." Any electronic communications, including email and
14 documents attached thereto, must be requested pursuant to the ESI Order.

15 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
16 Communications to, from, or with" to the extent it is seeking materials other than those governed
17 by the procedure for requesting email and electronic communications under the ESI Order, and
18 Meta interprets the Request as seeking such email and electronic communications and Documents
19 attached thereto.

20 Meta objects to this Request because, on its face, it does not exclude documents and
21 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
22 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine.
23 Rather, on its face, the Request explicitly seeks Documents and Communications with Jennifer
24 Newstead, an attorney serving as Chief Legal Officer at Meta, which role necessarily implicates
25 the attorney-client privilege and/or attorney work product doctrine. Documents are subject to the
26 attorney-client privilege and/or attorney work product doctrine will not be produced.

27 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
28 needs of the case to the extent that it is interpreted to seek all documents and communications

1 concerning the subject matter of the Request, and because the identified Person is an executive and
2 no showing has been made that the information sought is unavailable from others with direct
3 involvement with Training Data.

4 **REQUEST FOR PRODUCTION NO. 26:**

5 Documents and Communications to, from, or with Ahmad Al-Dahle Concerning Training
6 Data.

7 **RESPONSE TO REQUEST NO. 26:**

8 Meta incorporates by reference its objections and definitions above, including to the terms
9 “Training Data” and “Communications.” Any electronic communications, including email and
10 documents attached thereto, must be requested pursuant to the ESI Order.

11 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
12 Communications to, from, or with” to the extent it is seeking materials other than those governed
13 by the procedure for requesting email and electronic communications under the ESI Order, and
14 Meta interprets the Request as seeking such email and electronic communications and Documents
15 attached thereto.

16 Meta objects to this Request because, on its face, it does not exclude documents and
17 communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or
18 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
19 documents will not be produced.

20 Meta objects to this Request to the extent it seeks information that is not relevant to any
21 party’s claims or defenses.

22 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
23 needs of the case to the extent that it is interpreted to seek all documents and communications
24 concerning the subject matter of the Request, and because the identified Person is an executive and
25 no showing has been made that the information sought is unavailable from others with direct
26 involvement with Training Data.

27
28

REQUEST FOR PRODUCTION NO. 27:

Documents and Communications to, from, or with Mark Zuckerberg Concerning Training Data.

RESPONSE TO REQUEST NO. 27:

Meta incorporates by reference its objections and definitions above, including to the terms “Training Data” and “Communications.” Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and Communications to, from, or with” to the extent it is seeking materials other than those governed by the procedure for requesting email and electronic communications under the ESI Order, and Meta interprets the Request as seeking such email and electronic communications and Documents attached thereto.

Meta objects to this Request because, on its face, it does not exclude documents and communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such documents will not be produced.

Meta objects to this Request to the extent it seeks information that is not relevant to any party’s claims or defenses.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent that it is interpreted to seek all documents and communications concerning the subject matter of the Request, and because the identified Person is an executive and no showing has been made that the information sought is unavailable from others with direct involvement with Training Data.

REQUEST FOR PRODUCTION NO. 28:

Documents and Communications to, from, or with Marc Andreessen Concerning Training Data.

RESPONSE TO REQUEST NO. 28:

Meta incorporates by reference its objections and definitions above, including to the terms “Training Data” and “Communications.” Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and Communications to, from, or with” to the extent it is seeking materials other than those governed by the procedure for requesting email and electronic communications under the ESI Order, and Meta interprets the Request as seeking such email and electronic communications and Documents attached thereto.

Meta objects to this Request because Mr. Andreesen is a board member of Meta and, on its face, the Request does not exclude documents and communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such documents will not be produced.

Meta objects to this Request to the extent it seeks information that is not relevant to any party’s claims or defenses.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent that it is interpreted to seek all documents and communications concerning the subject matter of the Request, and because the identified Person is a Meta board member and no showing has been made that the information sought is unavailable from others with direct involvement with Training Data.

REQUEST FOR PRODUCTION NO. 29:

Documents and Communications to, from, or with Microsoft Corporation Concerning Training Data.

RESPONSE TO REQUEST NO. 29:

Meta incorporates by reference its objections and definitions above, including to the terms “Training Data” and “Communications.” Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

1 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
2 Communications to, from, or with” to the extent it is seeking materials other than those governed
3 by the procedure for requesting email and electronic communications under the ESI Order, and
4 Meta interprets the Request as seeking such email and electronic communications and Documents
5 attached thereto.

6 Meta also objects to this Request as vague and ambiguous as to the term “Microsoft
7 Corporation,” and, in particular, whether such term encompasses all employees and/or agents of
8 that company.

9 Meta objects to this Request because, on its face, it does not exclude documents and
10 communications exchanged under common interest privilege or that concern legal advice or
11 opinions, which are subject to privilege and/or attorney work product doctrine. Such documents
12 will not be produced.

13 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
14 needs of the case to the extent that it seeks all documents and communications concerning the
15 subject matter of the Request, because Microsoft Corporation is a third-party, and to the extent this
16 Request seeks documents and communications in the possession, custody, or control of a third-
17 party.

18 Meta objects to this Request to the extent it seeks information that is not relevant to any
19 party’s claims or defenses, in particular because Microsoft Corporation is a third-party.

20 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
21 Protective Order and ESI Order, following the identification of appropriate search terms and
22 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
23 communications, and subject to the foregoing objections as well as Meta’s objections to said
24 custodians and search terms, Meta will search for and produce non-privileged, relevant
25 communications responsive to this Request, if any, in accordance with the limitations set forth in
26 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
27 production shall be governed by terms of the Scheduling Order (ECF No. 87).

28

1 **REQUEST FOR PRODUCTION NO. 30:**

2 Documents and Communications to, from, or with OpenAI Concerning Training Data.

3 **RESPONSE TO REQUEST NO. 30:**

4 Meta incorporates by reference its objections and definitions above, including to the terms
5 “Training Data” and “Communications.” Any electronic communications, including email and
6 documents attached thereto, must be requested pursuant to the ESI Order.

7 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
8 Communications to, from, or with” to the extent it is seeking materials other than those governed
9 by the procedure for requesting email and electronic communications under the ESI Order, and
10 Meta interprets the Request as seeking such email and electronic communications and Documents
11 attached thereto. Meta further objects to this Request as vague, ambiguous, and unintelligible as to
12 the term “OpenAI,” and, in particular, as to which “OpenAI” entity and whether such term
13 encompasses all employees and/or agents of the company. In the context of this Request, Meta
14 will construe “OpenAI” to mean OpenAI LLC.

15 Meta objects to this Request because, on its face, it does not exclude documents and
16 communications exchanged under common interest privilege or that concern legal advice or
17 opinions, which are subject to privilege and/or attorney work product doctrine. Such documents
18 will not be produced.

19 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
20 needs of the case to the extent that it is interpreted to seek all documents and communications
21 concerning the subject matter of the Request, because OpenAI is a third-party, and to the extent
22 this Request seeks documents and communications in the possession, custody, or control of a third-
23 party.

24 Meta objects to this Request to the extent it seeks information that is not relevant to any
25 party’s claims or defenses, in particular because OpenAI is a third-party.

26 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
27 Protective Order and ESI Order, following the identification of appropriate search terms and
28 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic

1 communications, and subject to the foregoing objections as well as Meta's objections to said
2 custodians and search terms, Meta will search for and produce non-privileged, relevant
3 communications responsive to this Request, if any, in accordance with the limitations set forth in
4 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
5 production shall be governed by terms of the Scheduling Order (ECF No. 87).

6 **REQUEST FOR PRODUCTION NO. 31:**

7 Documents and Communications to, from, or with Anthropic Concerning Training Data.

8 **RESPONSE TO REQUEST NO. 31:**

9 Meta incorporates by reference its objections and definitions above, including to the terms
10 "Training Data" and "Communications." Any electronic communications, including email and
11 documents attached thereto, must be requested pursuant to the ESI Order.

12 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
13 Communications to, from, or with" to the extent it is seeking materials other than those governed
14 by the procedure for requesting email and electronic communications under the ESI Order, and
15 Meta interprets the Request as seeking such email and electronic communications and Documents
16 attached thereto. Meta further objects to this Request as vague, ambiguous, and unintelligible as to
17 the term "Anthropic," and, in particular, as to which "Anthropic" entity and as to whether such term
18 encompasses all employees and/or agents of that company. Meta will construe "Anthropic" to
19 mean Anthropic PBC.

20 Meta objects to this Request because, on its face, it does not exclude documents and
21 communications exchanged under common interest privilege or that concern legal advice or
22 opinions, which are subject to privilege and/or attorney work product doctrine. Such documents
23 will not be produced.

24 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
25 needs of the case to the extent that it is interpreted to seek all documents and communications
26 concerning the subject matter of the Request, because Anthropic is a third-party, and to the extent
27 this Request seeks documents and communications in the possession, custody, or control of a third-
28 party.

1 Meta objects to this Request to the extent it seeks information that is not relevant to any
2 party's claims or defenses, in particular because Anthropic is a third-party.

3 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
4 Protective Order and ESI Order, following the identification of appropriate search terms and
5 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
6 communications, and subject to the foregoing objections as well as Meta's objections to said
7 custodians and search terms, Meta will search for and produce non-privileged, relevant
8 communications responsive to this Request, if any, in accordance with the limitations set forth in
9 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
10 production shall be governed by terms of the Scheduling Order (ECF No. 87).

11 **REQUEST FOR PRODUCTION NO. 32:**

12 Documents and Communications to, from, or with Dell Inc. Concerning Training Data.

13 **RESPONSE TO REQUEST NO. 32:**

14 Meta incorporates by reference its objections and definitions above, including to the terms
15 "Training Data" and "Communications." Any electronic communications, including email and
16 documents attached thereto, must be requested pursuant to the ESI Order.

17 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
18 Communications to, from, or with" to the extent it is seeking materials other than those governed
19 by the procedure for requesting email and electronic communications under the ESI Order, and
20 Meta interprets the Request as seeking such email and electronic communications and Documents
21 attached thereto.

22 Meta also objects to this Request as vague and ambiguous as to the term "Dell Inc.," and,
23 in particular, as to whether such term encompasses all employees and/or agents of the company.

24 Meta objects to this Request because, on its face, it does not exclude documents and
25 communications exchanged under common interest privilege or that concern legal advice or
26 opinions, which are subject to privilege and/or attorney work product doctrine. Such documents
27 will not be produced.

28

1 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
2 needs of the case to the extent that it is interpreted to seek all documents and communications
3 concerning the subject matter of the Request, because Dell, Inc. is a third party, and to the extent
4 this Request seeks documents and communications in the possession, custody, or control of a third-
5 party.

6 Meta objects to this Request to the extent it seeks information that is not relevant to any
7 party's claims or defenses, in particular because Dell, Inc. is a third-party.

8 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
9 Protective Order and ESI Order, following the identification of appropriate search terms and
10 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
11 communications, and subject to the foregoing objections as well as Meta's objections to said
12 custodians and search terms, Meta will search for and produce non-privileged, relevant
13 communications responsive to this Request, if any, in accordance with the limitations set forth in
14 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
15 production shall be governed by terms of the Scheduling Order (ECF No. 87).

16 **REQUEST FOR PRODUCTION NO. 33:**

17 Documents and Communications to, from, or with Cloudflare, Inc. Concerning Training
18 Data.

19 **RESPONSE TO REQUEST NO. 33:**

20 Meta incorporates by reference its objections and definitions above, including to the terms
21 "Training Data" and "Communications." Any electronic communications, including email and
22 documents attached thereto, must be requested pursuant to the ESI Order.

23 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
24 Communications to, from, or with" to the extent it is seeking materials other than those governed
25 by the procedure for requesting email and electronic communications under the ESI Order, and
26 Meta interprets the Request as seeking such email and electronic communications and Documents
27 attached thereto.

28

1 Meta also objects to this Request as vague and ambiguous as to the term “Cloudflare, Inc.,”
2 and, in particular, as to whether such term encompasses all employees and/or agents of the
3 company.

4 Meta objects to this Request because, on its face, it does not exclude documents and
5 communications exchanged under common interest privilege or that concern legal advice or
6 opinions, which are subject to privilege and/or attorney work product doctrine. Such documents
7 will not be produced.

8 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
9 needs of the case to the extent that it is interpreted to seek all documents and communications
10 concerning the subject matter of the Request, because Cloudflare, Inc. is a third-party, and to the
11 extent this Request seeks documents and communications in the possession, custody, or control of
12 a third-party.

13 Meta objects to this Request to the extent it seeks information that is not relevant to any
14 party’s claims or defenses, in particular because Cloudflare, Inc. is a third-party.

15 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
16 Protective Order and ESI Order, following the identification of appropriate search terms and
17 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
18 communications, and subject to the foregoing objections as well as Meta’s objections to said
19 custodians and search terms, Meta will search for and produce non-privileged, relevant
20 communications responsive to this Request, if any, in accordance with the limitations set forth in
21 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
22 production shall be governed by terms of the Scheduling Order (ECF No. 87).

23 **REQUEST FOR PRODUCTION NO. 34:**

24 Documents and Communications to, from, or with Qualcomm Incorporated Concerning
25 Training Data.

26 **RESPONSE TO REQUEST NO. 34:**

27 Meta incorporates by reference its objections and definitions above, including to the terms
28 “Training Data” and “Communications.” Any electronic communications, including email and

1 documents attached thereto, must be requested pursuant to the ESI Order.

2 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
3 Communications to, from, or with” to the extent it is seeking materials other than those governed
4 by the procedure for requesting email and electronic communications under the ESI Order, and
5 Meta interprets the Request as seeking such email and electronic communications and Documents
6 attached thereto.

7 Meta also objects to this Request as vague and ambiguous as to the term “Qualcomm
8 Incorporated,” and, in particular, as to whether such term encompasses all employees and/or agents
9 of the company.

10 Meta objects to this Request because, on its face, it does not exclude documents and
11 communications exchanged under common interest privilege or that concern legal advice or
12 opinions, which are subject to privilege and/or attorney work product doctrine. Such documents
13 will not be produced.

14 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
15 needs of the case to the extent that it is interpreted to seek all documents and communications
16 concerning the subject matter of the Request, because Qualcomm Incorporated is a third-party, and
17 to the extent this Request seeks documents and communications in the possession, custody, or
18 control of a third-party.

19 Meta objects to this Request to the extent it seeks information that is not relevant to any
20 party’s claims or defenses, in particular because Qualcomm Incorporated is a third-party.

21 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
22 Protective Order and ESI Order, following the identification of appropriate search terms and
23 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
24 communications, and subject to the foregoing objections as well as Meta’s objections to said
25 custodians and search terms, Meta will search for and produce non-privileged, relevant
26 communications responsive to this Request, if any, in accordance with the limitations set forth in
27 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
28 production shall be governed by terms of the Scheduling Order (ECF No. 87).

REQUEST FOR PRODUCTION NO. 35:

Documents and Communications to, from, with, or Concerning Shawn Presser's involvement with either Books3, The Pile, any Meta Language Model, or anyone on Meta's AI team.

RESPONSE TO REQUEST NO. 35:

Meta incorporates by reference its objections and definitions above, including to the terms "Training Data" and "Meta Language Model." Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and Communications to, from, or with" to the extent it is seeking materials other than those governed by the procedure for requesting email and electronic communications under the ESI Order, and Meta interprets the Request as seeking such email and electronic communications and Documents attached thereto. Meta further objects to this Request as vague, ambiguous, and unintelligible as to the phrase "to, from, or with Shawn Presser's involvement with." In the context of this Request and considering the scope of Request No. 17, Meta will construe this phrase to mean documents, other than those subject to the procedure for requesting electronic communications under the ESI Order, concerning Shawn Presser's alleged involvement with Books3, The Pile, or the Meta Language Models.

Meta objects to this Request as vague, ambiguous, and unintelligible as to "Meta's AI team," which Meta will construe to mean individuals with primary responsibility for or direct oversight over the development or training of Meta Language Models (as construed above).

Meta objects to this Request because, on its face, it does not exclude documents and communications exchanged with or at the direction of Meta's attorneys concerning legal advice or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such documents will not be produced.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent that it is interpreted to seek all documents and communications concerning the subject matter of the Request, because Shawn Presser is a third-party, and to the

1 extent this Request seeks documents and communications in the possession, custody, or control of
2 a third-party.

3 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
4 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
5 privileged, relevant documents in its possession, custody, or control sufficient to show Shawn
6 Presser's involvement with Books3, The Pile, and/or any Meta Language Models (as construed
7 above), if any. Following the identification of appropriate search terms and custodians by Plaintiffs
8 pursuant to the ESI Order to be used to search for email and electronic communications, and subject
9 to the foregoing objections as well as Meta's objections to said custodians and search terms, Meta
10 will also search for and produce non-privileged, relevant communications responsive to this
11 Request, if any, in accordance with the limitations set forth in the ESI Order. Any such production
12 shall be on a rolling basis, and the timing of any such production shall be governed by terms of the
13 Scheduling Order (ECF No. 87).

14 **REQUEST FOR PRODUCTION NO. 36:**

15 All Documents and Communications Concerning any named Plaintiff's work being used as
16 input for the Meta Language Models, or their work (or portions thereof) being reproduced in the
17 output of any Meta Language Model.

18 **RESPONSE TO REQUEST NO. 36:**

19 Meta incorporates by reference its objections and definitions above, including to the terms
20 "Training Data" and "Meta Language Model." Any electronic communications, including email
21 and documents attached thereto, must be requested pursuant to the ESI Order.

22 Meta objects to this Request as vague, ambiguous, and unintelligible as to "Documents and
23 Communications to, from, or with" to the extent it is seeking materials other than those governed
24 by the procedure for requesting email and electronic communications under the ESI Order, and
25 Meta interprets the Request as seeking such email and electronic communications and Documents
26 attached thereto.

1 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Plaintiff’s work”
2 which is undefined. Meta is unable to determine what Plaintiffs claim as their respective “works”
3 other than those referenced in the First Consolidated Amended Complaint (“FCAC”).

4 Meta objects to this Request because, on its face, it does not exclude documents and
5 communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or
6 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
7 documents will not be produced.

8 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
9 needs of the case to the extent that it seeks “[a]ll” documents and communications concerning the
10 subject matter of the Request.

11 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
12 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
13 privileged, relevant documents in its possession, custody, or control sufficient to show any
14 copyrighted works asserted by the named Plaintiffs in the FCAC being used as training data for
15 Meta Language Models (as construed above) or being reproduced as outputs from such models, if
16 any. Following the identification of appropriate search terms and custodians by Plaintiffs pursuant
17 to the ESI Order to be used to search for email and electronic communications, and subject to the
18 foregoing objections as well as Meta’s objections to said custodians and search terms, Meta will
19 also search for and produce non-privileged, relevant communications concerning any copyrighted
20 works asserted in the FCAC being used as training data for Meta Language Models (as construed
21 above) or being reproduced as outputs from such models, if any, in accordance with the limitations
22 set forth in the ESI Order. Any such production shall be on a rolling basis, and the timing of any
23 such production shall be governed by terms of the Scheduling Order (ECF No. 87).

24 **REQUEST FOR PRODUCTION NO. 37:**

25 All Training Data authored by any named Plaintiff in the Complaint.

26 **RESPONSE TO REQUEST NO. 37:**

27 Meta incorporates by reference its objections and definitions above, including to the term
28 “Training Data.”

Meta objects to this Request as vague, ambiguous, and unintelligible as to “Training Data authored by any named Plaintiff,” as Meta is unable to determine what Plaintiffs purport to have authored.

Meta objects to this Request as duplicative of Request Nos. 1-3.

Subject to and without waiving the foregoing objections, and pursuant to the terms the Protective Order and ESI Order, Meta will conduct a reasonable search for and produce, or, if technically infeasible or impractical to produce, identify public sources of or permit inspection of, a copy of the training data set(s) used to train the Meta Language Models (as construed above).

REQUEST FOR PRODUCTION NO. 38:

All contracts, promissory notes, loans, obligations, estoppels, reservations of rights, investment agreements, shareholder agreements, shareholder rights agreements, purchase agreements, Or other agreements, including any drafts, between or among You and:

- a. Any of Meta Platforms Inc.’s parent companies, subsidiaries, affiliates, and affiliates;
- b. Any officer or director of any of Meta Platforms Inc.’s parent companies, subsidiaries, affiliates [sic], and affiliates;
- c. Any third parties involved in training any of the Meta Language Models;
- d. Any third parties involved in testing any of the Meta Language Models; Or
- e. Any third parties involved in creating filters for the Meta Language Models’ output.

RESPONSE TO REQUEST NO. 38:

Meta incorporates by reference its objections and definitions above, including to the term “Meta Language Model.”

Meta objects to this Request because, on its face, it does not exclude documents and communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such documents will not be produced.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case as it seeks “[a]ll” contracts and any promissory notes, loans, obligations,

1 estoppels, reservations of rights, investment agreements, shareholder agreements, shareholder
2 rights agreements, purchase agreements, or other agreements, which have limited, if any, relevance
3 to Plaintiffs' copyright infringement allegations and Meta's defenses thereto.

4 Meta objects to this Request to the extent it seeks information that is not relevant to any
5 party's claims or defenses, in particular as to any "promissory notes, loans, obligations, estoppels,
6 reservations of rights, investment agreements, shareholder agreements, shareholder rights
7 agreements, purchase agreements, or other agreements," as well as subparts (a) and (b) of this
8 Request. Meta will not search for or produce such agreements or drafts thereof.

9 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
10 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
11 privileged, relevant documents in its possession, custody, or control sufficient to show contracts
12 between Meta and third-parties with direct involvement in training, testing, and creating filters for
13 the Meta Language Models (as construed above), if any. Any such production shall be on a rolling
14 basis, and the timing of any such production shall be governed by terms of the Scheduling Order
15 (ECF No. 87).

16 **REQUEST FOR PRODUCTION NO. 39:**

17 All Communications Concerning the contracts, promissory notes, loans, obligations,
18 estoppels reservations of rights, investment agreements purchaser agreements, or other Agreements
19 responsive to the immediately preceding request.

20 **RESPONSE TO REQUEST NO. 39:**

21 Meta incorporates by reference its objections and definitions above, including to the term
22 "Communications." Any electronic communications, including email and documents attached
23 thereto, must be requested pursuant to the ESI Order.

24 Meta objects to this Request because, on its face, it does not exclude documents and
25 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
26 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
27 documents will not be produced.

28

1 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
2 needs of the case as it seeks “[a]ll” communications concerning the subject matter of the Request,
3 and, in particular, concerning any promissory notes, loans, obligations, estoppels, reservations of
4 rights, investment agreements, shareholder agreements, shareholder rights agreements, purchase
5 agreements, or other agreements, which have limited, if any, relevance to Plaintiffs’ copyright
6 infringement allegations and Meta’s defenses thereto.

7 Meta objects to this Request to the extent it seeks information that is not relevant to any
8 party’s claims or defenses, in particular as to any communications concerning “promissory notes,
9 loans, obligations, estoppels, reservations of rights, investment agreements, shareholder
10 agreements, shareholder rights agreements, purchase agreements, or other agreements,” as well as
11 subparts (a) and (b) of the preceding Request.

12 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
13 Protective Order and ESI Order, following the identification of appropriate search terms and
14 custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and electronic
15 communications, and subject to the foregoing objections as well as Meta’s objections to said
16 custodians and search terms, Meta will conduct a reasonable search for and produce non-privileged,
17 relevant communications concerning contracts between Meta and third-parties with direct
18 involvement in training, testing, and creating filters for the Meta Language Models (as construed
19 above), if any, in accordance with the limitations set forth in the ESI Order. Any such production
20 shall be on a rolling basis, and the timing of any such production shall be governed by terms of the
21 Scheduling Order (ECF No. 87).

22 **REQUEST FOR PRODUCTION NO. 40:**

23 All Documents that describe the formation Or constitution of You, Including partnership
24 agreements, shareholder agreements, shareholder rights agreements, articles of incorporation,
25 certificates or plans of dissolution, operating agreements, bylaws, capitalization tables, shareholder
26 registers, secretary of state filings, Or nonprofit registrations.

27
28

RESPONSE TO REQUEST NO. 40:

Meta incorporates by reference its objections and definitions above, including to the term “You.” Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

Meta objects to this Request because, on its face, it does not exclude documents and communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such documents will not be produced.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case as it seeks “[a]ll” documents concerning the subject matter of the Request, which have limited, if any, relevance to Plaintiffs’ copyright infringement allegations and Meta’s defenses thereto.

Meta objects to this Request to the extent it seeks information that is not relevant to any party’s claims or defenses.

Meta objects to this Request to the extent it seeks documents that are publicly available and equally accessible to Plaintiffs.

REQUEST FOR PRODUCTION NO. 41:

All Documents You have provided to the United States Senate in response to the letter You received from Senators Josh Hawley and Richard Blumenthal on or around June 6, 2023.

RESPONSE TO REQUEST NO. 41:

Meta incorporates by reference its objections and definitions above, including to the term “You.” Any electronic communications, including email and documents attached thereto, must be requested pursuant to the ESI Order.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case as it seeks “[a]ll” documents concerning the subject matter of the Request, including documents with limited, if any, relevance to Plaintiffs’ copyright infringement allegations and Meta’s defenses thereto.

1 Meta objects to this Request to the extent it seeks information that is not relevant to any
2 party's claims or defenses.

3 Meta objects to this Request to the extent it seeks documents that are publicly available and
4 equally accessible to Plaintiffs.

5 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
6 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
7 privileged, relevant documents in its possession, custody, or control provided by Meta to the United
8 States Senate in response to the letter Meta received from Senators Josh Hawley and Richard
9 Blumenthal on or around June 6, 2023. Any such production shall be on a rolling basis, and the
10 timing of any such production shall be governed by terms of the Scheduling Order (ECF No. 87).

11 **REQUEST FOR PRODUCTION NO. 42:**

12 All Documents You have provided to any United States regulatory body, including state or
13 local regulatory Documents, voluntarily or otherwise, regarding the Meta Language Models.

14 **RESPONSE TO REQUEST NO. 42:**

15 Meta incorporates by reference its objections and definitions above, including to the terms
16 "You" and "Meta Language Models." Any electronic communications, including email and
17 documents attached thereto, must be requested pursuant to the ESI Order.

18 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
19 needs of the case as it seeks "[a]ll" documents concerning the subject matter of the Request,
20 including documents with limited, if any, relevance to Plaintiffs' copyright infringement allegations
21 and Meta's defenses thereto.

22 Meta objects to this Request to the extent it seeks information that is not relevant to any
23 party's claims or defenses.

24 Meta objects to this Request to the extent it seeks documents that are publicly available and
25 equally accessible to Plaintiffs.

26 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
27 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
28 privileged, relevant documents in its possession, custody, or control provided by Meta to United

1 States regulatory bodies and that concern alleged use of copyrighted works to train LLMs. Any
2 such production shall be on a rolling basis, and the timing of any such production shall be governed
3 by terms of the Scheduling Order (ECF No. 87).

4 **REQUEST FOR PRODUCTION NO. 43:**

5 All Documents and Communications Concerning the “AI Insight Forum” held on
6 September 13, 2023 and organized by Sen. Charles Schumer.

7 **RESPONSE TO REQUEST NO. 43:**

8 Meta incorporates by reference its objections and definitions above, including to the term
9 “Communications.” Any electronic communications, including email and documents attached
10 thereto, must be requested pursuant to the ESI Order.

11 Meta objects to this Request because, on its face, it does not exclude documents and
12 communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or
13 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
14 documents will not be produced.

15 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
16 needs of the case as it seeks “[a]ll” documents concerning the subject matter of the Request,
17 including documents with limited, if any, relevance to Plaintiffs’ copyright infringement allegations
18 and Meta’s defenses thereto.

19 Meta objects to this Request to the extent it seeks information that is not relevant to any
20 party’s claims or defenses.

21 Meta objects to this Request to the extent it seeks documents that are publicly available and
22 equally accessible to Plaintiffs.

23 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
24 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
25 privileged, relevant documents in its possession, custody, or control sufficient to show the
26 documents shared by Meta with the Senate in connection with the “AI Insight Forum” held on
27 September 13, 2023. Following the identification of appropriate search terms and custodians by
28 Plaintiffs pursuant to the ESI Order to be used to search for email and electronic communications,

1 and subject to the foregoing objections as well as Meta’s objections to said custodians and search
2 terms, Meta will also search for and produce non-privileged, relevant communications responsive
3 to this Request, if any, in accordance with the limitations set forth in the ESI Order. Any such
4 production shall be on a rolling basis, and the timing of any such production shall be governed by
5 terms of the Scheduling Order (ECF No. 87).

6 **REQUEST FOR PRODUCTION NO. 44:**

7 All Documents You have provided to any governmental entity, elected officeholder, or
8 appointed official, Including state or local regulatory Documents, voluntarily or otherwise,
9 regarding generative AI, Training Data, the Meta Language Models, and all related
10 Communications.

11 **RESPONSE TO REQUEST NO. 44:**

12 Meta incorporates by reference its objections and definitions above, including to the terms
13 “You,” “Training Data,” “Meta Language Models,” and “Communications.” Any electronic
14 communications, including email and documents attached thereto, must be requested pursuant to
15 the ESI Order.

16 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
17 needs of the case as it seeks “[a]ll” documents and communications concerning the subject matter
18 of the Request, including documents with limited, if any, relevance to Plaintiffs’ copyright
19 infringement allegations and Meta’s defenses thereto.

20 Meta objects to this Request to the extent it seeks information that is not relevant to any
21 party’s claims or defenses, including materials provided to foreign governments.

22 Meta objects to this Request to the extent it seeks documents that are publicly available and
23 equally accessible to Plaintiffs.

24 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
25 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
26 privileged, relevant documents in its possession, custody, or control sufficient to show the
27 documents provided by Meta to United States governmental entities, elected officeholders, or
28 appointed officials that concern alleged use of copyrighted works to train LLMs. Following the

1 identification of appropriate search terms and custodians by Plaintiffs pursuant to the ESI Order to
2 be used to search for email and electronic communications, and subject to the foregoing objections
3 as well as Meta's objections to said custodians and search terms, Meta will also search for and
4 produce non-privileged, relevant communications between Meta and United States governmental
5 entities, elected officeholders, or appointed officials that concern alleged use of copyrighted works
6 to train LLMs, if any, in accordance with the limitations set forth in the ESI Order. Any such
7 production shall be on a rolling basis, and the timing of any such production shall be governed by
8 terms of the Scheduling Order (ECF No. 87).

9 **REQUEST FOR PRODUCTION NO. 45:**

10 All Documents and Communications Concerning any licensing, accreditation, or attribution
11 mechanism, or similar tool for crediting, compensating, or seeking consent from owners of
12 copyrighted works that were used to train the Meta Language Models.

13 **RESPONSE TO REQUEST NO. 45:**

14 Meta incorporates by reference its objections and definitions above, including to the terms
15 "Meta Language Models" and "Communications." Any electronic communications, including
16 email and documents attached thereto, must be requested pursuant to the ESI Order.

17 Meta also objects to this Request as vague and ambiguous as to the phrase "mechanism or
18 similar tool," which is undefined. Meta will construe this phrase to mean a software-based solution
19 or feature developed or used by Meta.

20 Meta objects to this Request because, on its face, it does not exclude documents and
21 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
22 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
23 documents will not be produced.

24 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
25 needs of the case as it seeks "[a]ll" documents concerning the subject matter of the Request,
26 including documents with limited, if any, relevance to Plaintiffs' copyright infringement allegations
27 and Meta's defenses thereto.

28

1 Meta objects to this Request to the extent it seeks information that is not relevant to any
2 party's claims or defenses, including claims dismissed from the original complaint and not included
3 in the FCAC.

4 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
5 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
6 privileged, relevant documents in its possession, custody, or control sufficient to show any
7 licensing, accreditation, or attribution mechanism or tool developed or used by Meta for crediting,
8 compensating, or seeking consent from owners of copyrighted works that were used to train any
9 Meta Language Models (as construed above). Following the identification of appropriate search
10 terms and custodians by Plaintiffs pursuant to the ESI Order to be used to search for email and
11 electronic communications, and subject to the foregoing objections as well as Meta's objections to
12 said custodians and search terms, Meta will also search for and produce non-privileged, relevant
13 communications responsive to this Request, if any, in accordance with the limitations set forth in
14 the ESI Order. Any such production shall be on a rolling basis, and the timing of any such
15 production shall be governed by terms of the Scheduling Order (ECF No. 87).

16 **REQUEST FOR PRODUCTION NO. 46:**

17 All Documents and Communications sufficient to show Your actual or projected income
18 from the sale or licensing of the Meta Language Models.

19 **RESPONSE TO REQUEST NO. 46:**

20 Meta incorporates by reference its objections and definitions above, including to the terms
21 "Your," "Meta Language Models," and "Communications." Any electronic communications,
22 including email and documents attached thereto, must be requested pursuant to the ESI Order.

23 Meta objects to this Request because, on its face, it does not exclude documents and
24 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
25 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
26 documents will not be produced.

27 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
28 needs of the case as it seeks "[a]ll" documents concerning the subject matter of the Request,

1 including documents with limited, if any, relevance to Plaintiffs' copyright infringement allegations
2 and Meta's defenses thereto.

3 Meta objects to this Request to the extent it seeks information that is not relevant to any
4 party's claims or defenses.

5 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
6 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
7 privileged, relevant documents in its possession, custody, or control sufficient to show Meta's
8 actual or projected income from the sale or licensing of the Meta Language Models (as construed
9 above). Any such production shall be on a rolling basis, and the timing of any such production
10 shall be governed by terms of the Scheduling Order (ECF No. 87).

11 **REQUEST FOR PRODUCTION NO. 47:**

12 All Documents and Communications Concerning the action entitled *Huckabee et al. v. Meta*
13 *Platforms, Inc.*, Case No. 1:23-cv-09152 (S.D.N.Y), Including any Documents and
14 Communications You produce, or have produced, to any parties (or third-parties) in that action.

15 **RESPONSE TO REQUEST NO. 47:**

16 Meta incorporates by reference its objections and definitions above, including to the terms
17 "You" and "Communications." Any electronic communications, including email and documents
18 attached thereto, must be requested pursuant to the ESI Order.

19 Meta objects to this Request because, on its face, it does not exclude documents and
20 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
21 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
22 documents will not be produced.

23 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
24 needs of the case as it seeks "[a]ll" documents concerning the subject matter of the Request,
25 including documents with limited, if any, relevance to Plaintiffs' copyright infringement allegations
26 and Meta's defenses thereto.

27 Meta objects to this Request to the extent it seeks information that is not relevant to any
28 party's claims or defenses.

1 Meta objects to this Request to the extent it seeks documents that are publicly available and
2 equally accessible to Plaintiffs, or are in Plaintiffs' possession, custody, or control, in particular
3 because Case No. 1:23-cv-09152 will be consolidated with this action, and Meta did not produce
4 documents in the S.D.N.Y. action.

5 **REQUEST FOR PRODUCTION NO. 48:**

6 All Documents You relied on in responding to Plaintiffs' Interrogatory No. 14, served
7 concurrently herewith.

8 **RESPONSE TO REQUEST NO. 48:**

9 Meta incorporates by reference its objections and definitions above, including to the term
10 "You." Any electronic communications, including email and documents attached thereto, must be
11 requested pursuant to the ESI Order.

12 Meta objects to this Request because, on its face, it does not exclude documents and
13 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
14 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
15 documents will not be produced.

16 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
17 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
18 privileged, relevant documents in its possession, custody, or control responsive to this Request.
19 Any such production shall be on a rolling basis, and the timing of any such production shall be
20 governed by terms of the Scheduling Order (ECF No. 87).

21 **REQUEST FOR PRODUCTION NO. 49:**

22 All Documents and Communications Concerning the decision to release the Meta Language
23 Models under what Meta calls an "open source" license.

24 **RESPONSE TO REQUEST NO. 49:**

25 Meta incorporates by reference its objections and definitions above, including to the terms
26 "Meta," "Meta Language Models," and "Communications." Any electronic communications,
27 including email and documents attached thereto, must be requested pursuant to the ESI Order.
28

1 Meta objects to this Request because, on its face, it does not exclude documents and
2 communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or
3 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
4 documents will not be produced.

5 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
6 needs of the case as it seeks “[a]ll” documents concerning the subject matter of the Request,
7 including documents with limited, if any, relevance to Plaintiffs’ copyright infringement allegations
8 and Meta’s defenses thereto.

9 Meta objects to this Request to the extent it seeks information that is not relevant to any
10 party’s claims or defenses.

11 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
12 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
13 privileged, relevant documents in its possession, custody, or control sufficient to show the
14 reasoning behind Meta’s decision to make its Meta Language Models (as construed above)
15 available to the public under an open license. Any such production shall be on a rolling basis, and
16 the timing of any such production shall be governed by terms of the Scheduling Order (ECF No.
17 87).

18 **REQUEST FOR PRODUCTION NO. 50:**

19 All Documents and Communications Concerning any individuals or entities who have been
20 given access to, or denied or limited access from, Llama 1 or Llama 2.

21 **RESPONSE TO REQUEST NO. 50:**

22 Meta incorporates by reference its objections and definitions above, including to the terms
23 “Communications,” “Llama 1,” and “Llama 2.” Any electronic communications, including email
24 and documents attached thereto, must be requested pursuant to the ESI Order.

25 Meta objects to this Request as vague, ambiguous, and unintelligible as to “Documents and
26 Communications to, from, or with” to the extent it is seeking materials other than those governed
27 by the procedure for requesting email and electronic communications under the ESI Order, and
28 Meta interprets the Request as seeking such email and electronic communications and Documents

1 attached thereto. In the context of this Request, Meta will construe this phrase to mean documents,
2 other than those subject to the procedure for requesting electronic communications under the ESI
3 Order.

4 Meta objects to this Request because, on its face, it does not exclude documents and
5 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or
6 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such
7 documents will not be produced.

8 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the
9 needs of the case as it seeks "[a]ll" documents concerning the subject matter of the Request,
10 including documents with limited, if any, relevance to Plaintiffs' copyright infringement allegations
11 and Meta's defenses thereto.

12 Subject to and without waiving the foregoing objections, and pursuant to the terms of the
13 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-
14 privileged, relevant documents in its possession, custody, or control sufficient to show the
15 individuals granted or denied access to Llama 1 and Llama 2. Any such production shall be on a
16 rolling basis, and the timing of any such production shall be governed by terms of the Scheduling
17 Order (ECF No. 87).

18 Dated: February 23, 2024

COOLEY LLP

19
20 By: /s/ Judd Lauter

21 Judd Lauter
22 Bobby Ghajar
23 Mark Weinstein
Kathleen Hartnett
Colette Ghazarian

24 Attorneys for Defendant
25 META PLATFORMS, INC.
26
27
28

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of California. I am employed in Santa Clara County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is Cooley LLP, 3175 Hanover Street, Palo Alto, California 94304-1130. On the date set forth below I served the documents described below in the manner described below:

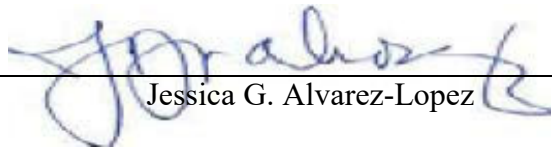
- **DEFENDANT META PLATFORMS, INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION**



(BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of Cooley LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed below.

on the following part(ies) in this action:

Executed on February 23, 2024, at Palo Alto, California.



Jessica G. Alvarez-Lopez

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